

February 29, 2019

Tampnet Inc. 326 Apollo Road Scott, LA 70583

Marlene H. Dortch, Secretary Federal Communications Commission 445 11th Street, SW Washington, DC 20554

Dear Ms. Dortch,

Please see attached annual CPNI filing for Tampnet Inc.

Annual 64.2009e CPNI Certification for 2019 covering the prior calendar year 2018

Name of Company(s) covered by this certification: Tampnet Inc. and subsidiaries

Form 499 Filer ID: 83056

Name of Signatory: Per Helge Svensson

Title of Signatory: Chief Executive Officer

My best regards,

David Heximer

**Director of Operations** 

Tampnet

## Certification:

I, Per Helge Svensson, CEO, certify that I am an officer of the company of Tampnet Inc. named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R § 64.2001 et seq.

Attached to this certification as Exhibit "A" is an accompanying statement explaining how Tampnet Inc. procedures ensure that the company is in compliance with the requirements set forth in Section 64.2001 *et seq.* of the Commission's rules.

Tampnet Inc. has not taken any actions (proceedings instituted, or petitions filed by a company at either state commissions, the court system, or at the Commission) against data broker in the past year.

Tampnet Inc. has not received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to the unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, e.g., instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Signature: Per Huge Swensson

Print Name: Per Helge Svensson

Title: CEO

## Annual 47 C.F.R § 64.2009(e) CPNI Certification EB Docket 06-36

Exhibit A

Tampnet, Inc.

**Compliance Requirements** 

Ph:866.621.5290 • Fx:337.205.8761

## Section 64.2007 Approval required for use of customer proprietary network information.

The Company has adopted specific CPNI policies to ensure that, in the absence of customer approval, CPNI is only used by the Company to provide or market service offerings among the categories of service (i.e., local interexchange, and CMRS) to which the customer already subscribes. The Company's CPNI policies prohibit the sharing of CPNI with affiliated companies, except as permitted under Rule 64.2005(a)(1) or with customer approval pursuant to Rule 64.2007(b). The only exceptions to these policies are as permitted under 47 U.S.C § 222(d) and Rule 64.2005.

In all circumstances where customer approval is required to use, disclose or permit access to CPNI, the Company's CPNI policies require that the Company obtain customer approval through written, oral or electronic methods in compliance with Rule 64.2007. A customer's approval or disapproval remains in effect until the customer revokes or limits the approval or disapproval. The Company maintains records of customer approval (whether written, oral or electronic) for a minimum of one year.

The Company does not use CPNI for any purpose (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents or affiliates that provide communications-related services), except as permitted under 47 U.S.C. § 222(d) and Rule 64.2005.

Section 64.2008 Notice required for use of customer proprietary network information.

The Company's CPNI policies require that customers be notified of their rights, and the Company's obligations, with respect to CPNI prior to any solicitation for customer approval. All required customer notices (whether written, oral or electronic) comply with the requirements of Rule 64.2008. The Company maintains records of all required customer notices (whether written, oral or electronic) for a minimum of one year.

The Company does not currently solicit "opt out" customer approval for the use or disclosure of CPNI, The Company does not use CPNI for any purposes (including marketing communications-related services) and does not disclose or grant access to CPNI to any party (including to agents

or affiliates that provide communications-related services), except as permitted under 47 U.S.C § 222(d) and Rule 64.2005.

The Company does not currently solicit "opt-in" customer approval for the use or disclosure of CPNI. The Company does not use, disclose or grant access to CPNI for any purpose, to any party or in any manner that would require a customer's "opt in" approval under the Commission's CPNI Rules.

In instances where the Company seeks one-time customer approval for the use or disclosure of CPNI, the Company obtains such approval in accordance with the disclosures, methods and requirements contained in Rule 2008(f).

Section 64.2009 Safeguards required for use of customer proprietary network information.

The Company's billing system allows authorized company personnel to easily determine the status of a customer's CPNI approval on the customer account screen prior to the use or disclosure of CPNI.

The Company has established CPNI compliance polices that include employee training on restrictions on the use and disclosure of CPNI and required safeguards to protect against unauthorized use or disclosure of CPNI. Employees have signed that they understand the CPNI policies and a violation of those policies will result in disciplinary action.

The Company's CPNI policies require that all sales and marketing campaigns including those utilizing CPNI be recorded and kept on file for at least one year. Records are also maintained for disclosure or access to CPNI by third parties. The records include the required information listed in Rule 64.2009 (c).

The Company's CPNI policies require employees to obtain approval from the Company's CPNI Compliance Officer for all marketing campaigns, including those utilizing CPNI, prior to initiating that campaign. Record of the marketing campaigns, along with the appropriate supervisory approval is maintained for at least one year.

The required officer certification actions taken against data brokers and summary of customer complaint documents are included with this accompanying statement. The Company will file these documents on an annual basis on or before March 1 for data pertaining to the previous calendar year.

The Company does not currently solicit "opt out" customer approval for the use or disclosure of CPNI.

Section 64.2010 Safeguards on the disclosure of customer proprietary network information.

The Company's CPNI policies and employee training include reasonable measures to discover and protect against activity that is indicative of pretexting and employees are instructed to notify the CPNI Compliance Officer if any such activity is suspected.

The Company's CPNI policies ensure that a customer is only able to access call detail information over the telephone on one of the ways listed in Rule 64.2010(b). If the customer cannot remember their password, they are prompted to answer a security question. Neither the password nor the security question are based on readily available biographical information or account information. Customer service representatives are instructed to authenticate customers over the telephone in all instances except in the case where the customer provides the call detail information without the assistance of the Company.

The company authenticates customers without the use of readily available biographical or account information prior to allowing on access to CPNI related to an account. Once authenticated, the customer may only obtain access to CPNI through a password, that is not prompted by readily available biographical or account information.

The Company does not have retail locations.

The Company's CPNI policies allow for a few ways to establish a password, all of which ensure compliance with the above paragraph. Each method also allows the customer to establish a back-up or security question in the event that they forget their password. In no event does the Company use readily available biographical information or account information as a back-up question or as a means to establish a password or authenticate the customer.

The company will notify a customer immediately when account changes occur, including a password, a response to a back-up means of authentication, or address of record. The notification will be through a carrier-originated voicemail or text message to the telephone number of record, or by mail to the address of record, and will not contain the changed information or be sent to the new account information.

The Company does not utilize the business customer exception at this time.

## Section 64.2011 Notification of customer proprietary network information security breaches.

The Company has policies and procedures in place to ensure compliance with Rule 64.2011. When it is reasonably determined that a breach has occurred, the CPNI Compliance Officer will notify law enforcement and its customers in the required timeframes. A record of the breach will be maintained for a minimum of two years and will include all information required by Rule 64.2011.